



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Magellan Midstream Partners, L.P., Mankato, MN

FROM: Veronica Fischer, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Magellan Midstream Partners, L.P.

Facility Location: 55199 State Highway 68, Mankato, Minnesota

Date of Inspection: July 13, 2022

EPA Inspector(s):

1. Veronica Fischer, Environmental Engineer
2. Constantinos Loukeris, Environmental Engineer

Other Attendees:

1. Cory Hakala, Technician
2. Troy Friedrichs, Operator
3. Kevin Keup, Operator
4. Brandy Chappelle, Environmental Air Specialist (via phone)

Contact Email Address: Brandy.Chappelle@magellanlp.com

Purpose of Inspection: Tanks inspection

Facility Type: Tank farm

Regulations Central to Inspection: NESHAP BBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities; NSPS Kb – Volatile Organic Liquid Storage Vessels

Arrival Time: 12:40 PM CST

Departure Time: 2:20 PM CST

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from facility personnel unless otherwise noted.

Process Description:

Magellan Midstream Partners, L.P. (Magellan) owns and operates a liquid petroleum bulk storage terminal in Mankato, Minnesota, known as the Mankato Terminal. The Mankato has 5 gasoline tanks and one tank truck loading rack with 3 loading spots.

Staff Interview: The loading rack has a vapor collection and combustion system. The combustor is used as a relief system for overpressure of the incoming vapor line. Floating roof tank seals are inspected visually through the roof hatch.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA toured the facility and performed optimal gas imaging with a FLIR® camera. The FLIR® camera was used to identify hydrocarbon emissions from tank vents, roof hatches once opened, and the loading rack and associated drains. A record of videos taken using the FLIR® camera is located in Appendix A to this report.

EPA monitored the %LEL concentration of hydrocarbon vapors in the vapor space between the fixed roofs and floating roofs using a 4-gas detector. A record of the readings observed using the 4-gas detector is located in Appendix B to this report.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were taken during this inspection.

- 4-gas detector readings

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- For all internal floating roof tanks and geodesic covered external floating tanks the following information was requested:
 - Installation date;
 - If the tank is a breakout tank;
 - Current rim seal types for every primary and/or secondary seal, if present. (e.g. mechanical shoe, rim mounted, etc.);
 - Current floating roof design (e.g. pontoon, aluminum, etc.);
 - Dates any secondary seals were added or removed including whether it was removed or added;
 - Dates of the last internal floating roof and/or seal replacements including the type of the internal floating roof/seal that was installed before and after; and
 - Date when the unslotted guide pole was replaced with a slotted guide pole or was modified to include slots.
- The regulatory applicability for each tank (e.g. NSPS Kb, NESHAP BBBBBB, etc.) and compliance option within each standard as it applies.
 - Information relating to any change of compliance option.
- The date of the last API 653 inspection and a list of any work completed as a result of the API 653 inspection.
- Date the vapor hose/camlock assembly in each loading rack bay was last replaced.
- How Magellan operates and maintains the drains located at the loading racks.
- Most recent stack testing completed for each combustor.

Concerns: EPA discussed the hydrocarbon emissions identified from some of the storage tanks as a possible indication of issues with the floating roofs.

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____

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APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image and Video Log
2. Appendix B: 4-gas Detector Readings

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Veronica Fischer	2. Archival Record Location: OneDrive
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	MOV_2726.mp4	July 13, 2022, 2:02 PM	N/A	Emissions from Tank 1325 vents
2	MOV_2727.mp4	July 13, 2022, 2:05 PM	N/A	Emissions from Tank 1325 roof hatch
3	MOV_2728.mp4	July 13, 2022, 2:06 PM	N/A	Emissions from Tank 1325 top vent
4	MOV_2729.mp4	July 13, 2022, 2:26 PM	N/A	Emissions from Tank 1384 vents
5	MOV_2730.mp4	July 13, 2022, 2:29 PM	N/A	Emissions from Tank 1384 vents
6	MOV_2731.mp4	July 13, 2022, 2:30 PM	N/A	Emissions from Tank 1384 vents
7	MOV_2732.mp4	July 13, 2022, 2:33 PM	N/A	Emissions from Tank 1384 roof hatch
8	MOV_2733.mp4	July 13, 2022, 2:34 PM	N/A	Emissions from Tank 1384 roof hatch
9	MOV_2734.mp4	July 13, 2022, 2:39 PM	N/A	Emissions from Tank 1324 vents
10	MOV_2735.mp4	July 13, 2022, 2:41 PM	N/A	Emissions from Tank 1324 vents
11	MOV_2736.mp4	July 13, 2022, 2:42 PM	N/A	Emissions from Tank 1324 vents
12	MOV_2737.mp4	July 13, 2022, 2:52 PM	N/A	Emissions from Tank 1322 vents
13	MOV_2738.mp4	July 13, 2022, 2:53 PM	N/A	Emissions from Tank 1322 vents
14	MOV_2739.mp4	July 13, 2022, 2:54 PM	N/A	Emissions from Tank 1322 vents

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APPENDIX B: FIELD MEASUREMENT DATA

Location	LEL (%)
Tank 1322	5
Tank 1324	5
Tank 1325	9